

March 13, 2020

MEMO ENDORSED

VIA ECF and Email

Honorable Paul G. Gardephe
 United States District Judge
 United States Courthouse
 40 Foley Square
 New York, NY 10007

RE: United States v. Omar Amanat, 15 Cr. 536 (PGG)
 Emergency Bail Application

Dear Judge Gardephe:

We are writing to move the Court to grant Omar Amanat release pending his sentence. Mr. Amanat is within the group of people the Centers for Disease Control and Prevention ("CDC") has categorized as most-at-risk for dying from COVID-19, a dangerous illness spreading rapidly across the world, through New York State and within New York City. We have learned that a security officer at the United States Attorneys Office has tested positive and now the Bureau of Prisons has suspended all visits to the MDC. 18 U.S.C. § 3143 of The Bail Reform Act provides for the release of a defendant pending sentence. Mr. Amanat is not a flight risk and does not pose a danger to the community. Mr. Amanat has a history of strokes and his carotid artery is blocked. People with underlying heart and stroke conditions are at serious risk of serious illness and even death if they contract COVID-19. Mr. Amanat was hospitalized for a stroke while incarcerated in MCC. After a two-week period of quarantine he will be living at his parents' home in New Jersey. We asked the government for its position on this request

The Government is directed to respond to this letter by 5:00pm March 16, 2020. The Government will address in detail the allegations concerning the possibility that an inmate who is positive for the presence of the coronavirus is detained at the MCC, along with the allegations regarding general conditions at the MCC. The Government will also address in detail Defendant's arguments concerning Amanat's likely sentence, and current medical condition.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

March 13, 2020